

BAKER BOTTS LLP

August 21, 2012

BY FACSIMILE**MEMO ENDORSED**

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The Honorable Laura Taylor Swain
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 11C
New York, New York 10007

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Re: Williamson v. Verizon Communications Inc. et al., Case No. 1:11-cv-04948 (LTS)

Dear Judge Swain:

We represent Defendants AT&T, Inc., AT&T Operations, Inc., and AT&T Services, Inc. ("AT&T") in the above-referenced action, and write to request permission to file a confidential document under seal. No protective order has yet been entered in this case, though the parties are actively preparing and conferring on a form of stipulated protective order to be submitted for the Court's consideration.

AT&T is filing a declaration in support of their reply memorandum in support of their motion to strike the declaration and preclude testimony of plaintiff's proffered expert, Dr. Cooper today. One of the exhibits AT&T seeks to submit in support are portions of a deposition transcript that has been designated Highly Confidential. We respectfully request that the Court enter an Order permitting AT&T to file this supporting exhibit under seal.

AT&T has good cause for this request because the deposition transcript contains highly confidential information, the disclosure of which to the public could result in injury to AT&T. AT&T has conferred with counsel for Plaintiff in good faith and Plaintiff does not oppose this request for under seal filing.

Respectfully submitted,



Robert L. Maier

The request is granted.

RLM:jpm

cc: All Counsel of Record (via email)

SO ORDERED.

NEW YORK, NY

Aug 24, 2012


LAURA TAYLOR SWAIN

UNITED STATES DISTRICT JUDGE